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October 16, 2013

Magistrate Judge James Orenstein 225 Cadman Plaza East Brooklyn, NY 11201 Chambers: Room 1227 South

Courtroom: 11D South Telephone: (718) 613-2110

Courtroom Deputy: Alicia Guy (718) 613-2114

VIA ECF

RE: Felice Rothenberg-Sapiro v JP MORGAN CHASE BANK and LULU

STILES 13-cv-02409-DLI-JO

Consent Application to adjourn the October 18, 2013 filing date for the Joint Pretrial Discovery Plan order and to adjourn the Initial Discovery Planning Conference Initial October 22, 2013 conference two weeks to

November 1, 2013

Dear Magistrate Judge Orenstein:

I have represent the Plaintiff Ms. Felice Rothenberg - Sapiro regarding her claims relating to her termination from her position as a Personal banker at JPMorganChase.

The Plaintiff requests on consent that the date for the filing of the parties joint pretrial discovery order currently set for this Friday October 18, 2013 be extended two weeks to November 1, 2013 and that the initial discovery conference currently set for Tuesday October 22, 2013 be adjourned to Wednesday November 6, 2013 at 11:30 am or any time that morning convenient to the Court due to a pre planned vacation of Plaintiff's counsel which renders counsel unavailable for said dates.

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In accordance with Paragraph II A (1) of this Court's Individual Practice Rules, Counsel states as follows:

- (1) The original date for the filing of the joint discovery plan is October 18, 2013. The original date for the initial discovery conference was October 22, 2013 @11:30 a.m.
- (2) There have been no previous requests for this extension.
- (3) N/A as there were no previous requests for extension
- (4) Defense counsel, Joanna R. Varon, Esq of Duane Morris LLP consents
- (5) This request does not affect any other scheduled deadline.

Sincerely,

Brian McCaffrey, Esq.

cc. Joanna R. Varon 1540 Broadway New York, NY 10036 (212) 692-1000 Attorneys for Defendants Via ecf